



Dear (Do Promani)

## The OTTOVILLE BANK Co.

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Ottoville, Ohio 45876

Phone: 419-453-3313 FAX: 419-453-3003

July 8, 2006

Mr. John F. Carter  
Regional Director  
Federal Deposit Insurance Corporation  
25 Jessie Street at Ecker Square, Suite 2300  
San Francisco, CA 95105

### **Re: Comments Regarding FDIC Application #20051977; Wal-Mart Application for Insurance and Industrial Bank Charter**

Dear Mr. Carter:

I am writing to oppose the application of Wal-Mart Stores, Inc., for Federal deposit insurance coverage for an ILC charter in Utah. I am a community banker and believe strongly that allowing Wal-Mart to own a bank charter and potentially open branches in its network of stores would do irreparable harm to my community and my institution, and pose a severe systemic risk to our nation's economy.

I am aware that Wal-Mart has stated that it intends to operate a limited ILC charter in Utah. I am skeptical. Their assurances that the operation will remain narrow ring hollow in the context of the company's history and corporate philosophy. In an article in the Wall Street Journal on July 6, 2006 there was a quote by Jane Thompson, President of Wal-Mart's financial-services operations as follows, "We have only scratched the surface of what's possible." This tells me that bigger things are on the horizon.

Wal-Mart did not open stores in those communities to be civic partners with local merchants; they opened stores to drive local merchants out of business and steal their customers, which is just what they did. The largest company in the world could do the same thing to community banks. The FDIC would be ill-advised to set this nation on a course that could result in the demise of the community banking industry as we know it today.

Congress has reaffirmed our nation's long standing policy against the mixing of banking and commerce, and with good reason. Mixing banking and commerce would create serious conflicts of interest and distort credit decisions. Listening to Congress on placing a hold on this issue may be prudent at this time. Is the FDIC ready to properly exam each Wal-Mart for compliance of BSA and Anti-Money Laundering issues? In the same article as referenced above it stated in ONE day it processed 328 money orders in Selma, Ala., 163 money transfers ( issues out for comment to lower threshold) in New Orleans and 151 check-cashing transactions in Birmingham , Ala.. This appears a donning task.

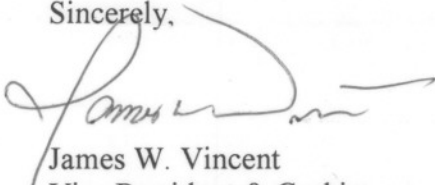
Member  
**FDIC**



Even more importantly, the largest company in the world owning a bank would produce a dangerous concentration of economic power and resources that would pose severe systemic risks to our economy. Think what would have happened if Enron owned a bank? Or Worldcom? It could have exposed the FDIC fund to enormous liability and pulled down our entire financial system. Our nation cannot afford to take that risk to save Wal-Mart a couple of pennies on each credit and debit card transaction.

For the sake of the community banks of our nation and the customers and communities we serve, please do not allow Wal-Mart to get into the banking business. Make a statement for fair competition and consumer choice by denying Wal-Mart's application for deposit insurance.

Sincerely,

A handwritten signature in dark ink, appearing to read "James W. Vincent", with a stylized flourish extending to the right.

James W. Vincent  
Vice President & Cashier